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Filed : October 1, 2001

### REMARKS

The Applicants thank the Examiner for his examination of the present application. By way of summary, Claims 1-19 and 26-38 were pending in this application, and Claims 20-25 were withdrawn. In the Office Action mailed August 19, 2005, the Examiner allowed Claims 1-10, rejected Claims 11-14, 16-19, and 26-38, and objected to Claim 15. In particular, the Examiner rejected Claims 11-14, 16-19, and 26-38 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,786,857 to Yamaguchi ("Yamaguchi") in view of U.S. Patent No. 6,081,211 to de Queiroz ("de Queiroz").

This Amendment amends Claims 1, 11, 15, 16, and 26 and adds Claims 39-40. Thus, after entry of this Amendment, Claims 1-19 and 26-40 remain pending.

#### A. ALLOWANCE OF CLAIMS 1-10

The Applicants also thank the Examiner for the indication of allowable subject matter in Claims 1-10. Applicants have amended Claim 1, without altering its scope in order to show proper antecedent basis and is not made for patentability purposes. Accordingly, Applicants request that amended Claim 1 be passed to allowance.

#### B. OBJECTION TO CLAIM 15

The Examiner objected to Claim 15 as being dependent upon a rejected base claim noting that it would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have amended Claim 15 to include all of the limitations of the base claim and the intervening claim. Accordingly, Applicants request that the objection to Claim 15 be withdrawn and that the Examiner pass Claim 15 to allowance.

#### C. REJECTION OF CLAIMS 11-14, 16-19, AND 26-38 UNDER 35 U.S.C. § 103

The Examiner rejected Claims 11-14, 16-19, and 26-38 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 5,786,857 to Yamaguchi ("Yamaguchi") in view of U.S. Patent No. 6,081,211 to de Queiroz ("de Queiroz"). Applicants respectfully traverse this rejection and the Examiner's characterization of the cited references. Yamaguchi, alone or in combination with de Queiroz, fails to teach or suggest the elements of the claims. See M.P.E.P. § 2143 (stating that in order to establish a *prima facie* case of obviousness for a claim, the prior art references must teach or suggest all the claim limitations). Thus, to sustain the foregoing

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rejections of Claims 11-14, 16-19, and 26-38, Yamaguchi, alone or in combination with de Queiroz, must identically teach or suggest every element of Claims 11-14, 16-19, and 26-38, which it does not.

Accordingly, Applicants respectfully submit that the claims as originally pending are patentably distinguished over Yamaguchi and de Queiroz. Claims 11, 16, and 25, however, have been amended without altering their scope in order to clarify the features of Applicants' inventions. These claim amendments are not made for patentability purposes, and it is believed that the claims would satisfy the statutory requirements for patentability without the entry of such amendments. Applicants therefore respectfully submit that Claims 11-14, 16-19, and 26-38 are patentably distinguished over the cited references and Applicants respectfully request allowance of Claims 11-14, 16-19, and 26-38.

**1. Independent Claim 11**

With respect to Claim 11, the Examiner stated that Yamaguchi discloses an apparatus that relates to image processing and that receives a matrix of transform coefficients and creates a probabilistic model representing dependencies and correlations between coefficient locations and groups of coefficients from the matrix. Applicants respectfully disagree. Yamaguchi does not disclose "creating a two-dimensional probabilistic model representing dependencies and correlations between coefficient locations and groups of coefficients from said set of quantized transform coefficients." Moreover, as admitted by the Examiner, Yamaguchi does not disclose "utilizing the probabilistic model to create an entropy encoding of the matrix." In addition, Applicants respectfully submit that neither Yamaguchi nor de Queiroz disclose "utilizing the two-dimensional probabilistic model to create an entropy encoding of the set of quantized transform coefficients."

Thus, Applicants respectfully submit that Yamaguchi, alone or in combination with de Queiroz, fails to disclose the claimed subject matter of Claim 11, including each element of Claim 11, and Applicants respectfully request that the rejection of Claim 11 be withdrawn.

**2. Dependent Claims 12-14**

Claims 12-14, which depend from independent Claim 11 and include all the limitations of Claim 11, are believed to be patentable for the same reasons stated above with respect to Claim 11 and because of the additional limitations set forth therein. Since Yamaguchi, alone or in

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combination with de Queiroz, fails to disclose every element of Claims 12-14, Applicants respectfully request that the rejection of Claims 12-14 be withdrawn.

**3. Independent Claim 16**

The Examiner rejected Claim 16 on the same basis as Claim 11 and 14 above. Accordingly, as set forth above with respect to Claims 11 and 14, Applicants respectfully submit that Yamaguchi, alone or in combination with de Queiroz, fails to disclose the claimed subject matter of Claim 16, including each element of Claim 16, and Applicants respectfully request that the rejection of Claim 16 be withdrawn.

**4. Dependent Claims 17-19**

Claims 17-19, which depend from independent Claim 16 and include all the limitations of Claim 16, are believed to be patentable for the same reasons stated above with respect to Claim 16 and because of the additional limitations set forth therein. Since Yamaguchi, alone or in combination with de Queiroz, fails to disclose every element of Claims 17-19, Applicants respectfully request that the rejection of Claims 17-19 be withdrawn.

**5. Independent Claim 26**

The Examiner rejected Claim 26 on the same basis as Claim 11 and 16 above. Accordingly, as set forth above with respect to Claims 11 and 16, Applicants respectfully submit that Yamaguchi, alone or in combination with de Queiroz, fails to disclose the claimed subject matter of Claim 26, including each element of Claim 26, and Applicants respectfully request that the rejection of Claim 26 be withdrawn.

**6. Dependent Claims 27-38**

Claims 27-38, which depend from independent Claim 26 and include all the limitations of Claim 26, are believed to be patentable for the same reasons stated above with respect to Claim 26 and because of the additional limitations set forth therein. Since Yamaguchi, alone or in combination with de Queiroz, fails to disclose every element of Claims 27-38, Applicants respectfully request that the rejection of Claims 27-38 be withdrawn.

**D. NEW CLAIMS**

New Claims 39-40 have been added to more fully define the Applicants' invention and are believed to be fully distinguished over the prior art of record. Claims 39-40 are believed to

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be patentable for the same reasons stated above with respect to Claim 11. Accordingly, Applicants respectfully request that the Examiner pass Claims 39-40 to allowance.

**E. REQUEST FOR TELEPHONE INTERVIEW**

Pursuant to M.P.E.P. § 713.01, in order to expedite prosecution of this application, Applicants' undersigned attorney of record hereby formally requests a telephone interview with the Examiner as soon as the Examiner has considered the effect of the arguments presented above. Applicants' attorney can be reached at (949) 721-7603 or at the number listed below.

**F. CONCLUSION**

In view of the forgoing, the present application is believed to be in condition for allowance, and such allowance is respectfully requested. If further issues remain to be resolved, the Examiner is cordially invited to contact the undersigned such that any remaining issues may be promptly resolved. Also, please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

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Dated: Nov. 22, 2005

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